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November 10, 2015

VIA ECF

Hon. Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *In re Platinum and Palladium Antitrust Litigation*, No. 14-cv-9391 (S.D.N.Y.)

Dear Judge Woods:

We represent the Plaintiffs in the above captioned matter. We write to inform the Court that Defendants BASF Metals Limited, BASF Corp. (together, “BASF”), ICBC Standard Bank Plc (“ICBC Standard”), and the London Platinum and Palladium Fixing Co. Ltd. (“LPPFC”) have agreed that Plaintiffs may file a consolidated opposition to these defendants’ respective individual motions to dismiss.

On September 21, 2015, BASF, ICBC Standard, and LPPFC each filed supplemental motions to dismiss Plaintiffs’ Second Consolidated Amended Complaint under Rule 12(b)(2) and 12(b)(6). *See* ECF Nos. 117 (BASF), 119 (LPPFC), and 120 (ICBC Standard). Previously, Plaintiffs and Defendants agreed to the following page limits for Plaintiffs’ opposition briefs to these motions: 12 pages each for BASF and ICBC Standard; and 15 pages for LPPFC (39 pages combined).

Recognizing the overlap in the issues raised in Defendants’ above-identified individual motions, in the interests of judicial economy and for the Court’s convenience, Plaintiffs proposed filing a consolidated opposition responding to each of the above-identified motions. Plaintiffs also proposed briefing the issues within 32 pages. BASF, ICBC Standard, and LPPFC have agreed to this proposal.

If Your Honor wishes, the parties will submit a stipulation and proposed order, embodying their agreement.

Sincerely,

/s/ Gregory S. Asciolla
Labaton Sucharow LLP

/s/ Merrill G. Davidoff
Berger & Montague, P.C.

cc: All Defendants’ Counsel (via ECF)